

From: [Linc Wehrly](#)
To: [Karl Simon](#)
Cc: [Dan Harrison](#); [Emily Chen](#); [Janet Cohen](#); [Khesha Jennings](#); [Martin Reineman](#); [Stephen Healy](#)
Subject: Re: Mercedes Bluetec Technology
Date: 03/03/2006 03:26 PM

Deliberative Process / Ex. 5

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**Karl
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Received Date:
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To: [Linc Wehrly/AA/USEPA/US@EPA](#)
cc: [Dan Harrison/AA/USEPA/US@EPA](#), [Emily Chen/AA/USEPA/US@EPA](#), [Janet Cohen/AA/USEPA/US@EPA](#), [Khesha Jennings/DC/USEPA/US@EPA](#), [Martin Reineman/AA/USEPA/US@EPA](#), [Stephen Healy/AA/USEPA/US@EPA](#)
Subject: Re: Mercedes Bluetec Technology 

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▼ [Linc Wehrly/AA/USEPA/US](#)

**Linc
Wehrly/AA/USEPA/US**

03/03/2006 03:09 PM

To: [Emily Chen/AA/USEPA/US@EPA](#)
[Dan Harrison/AA/USEPA/US@EPA](#), [Janet Cohen/AA/USEPA/US@EPA](#), [Karl Simon/DC/USEPA/US@EPA](#), [Khesha Jennings/DC/USEPA/US@EPA](#), [Martin Reineman/AA/USEPA/US@EPA](#), [Stephen Healy/AA/USEPA/US@EPA](#)
cc: [Emily Chen/AA/USEPA/US@EPA](#)
Subject: Re: Mercedes Bluetec Technology 

Thanks, Emily.

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03/03/2006 02:59:25 PM

To Linc Wehrly/AA/USEPA/US@EPA
cc Dan Harrison/AA/USEPA/US@EPA, Janet
Cohen/AA/USEPA/US@EPA, Karl
Simon/DC/USEPA/US@EPA, Khesha
Jennings/DC/USEPA/US@EPA, Martin
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Subject Re: Mercedes Bluetec Technology 

I have two more concerns:

1. Readiness and coverage of urea distribution infrastructure.
2. Low temp (ice point) impacts and prevention measurements, if necessary.

Emily
▼ Linc Wehrly/AA/USEPA/US

**Linc
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Sent by: Linc Wehrly

Received Date:
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To Karl Simon/DC/USEPA/US@EPA
cc Dan Harrison/AA/USEPA/US@EPA, Janet
Cohen/AA/USEPA/US@EPA, Emily
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Reineman/AA/USEPA/US@EPA, Stephen
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Subject Mercedes Bluetec Technology

Karl,

I wanted to confirm our thoughts on the Mercedes Blutec (SCR) technology so that when Simon Godwin comes to meet with us in Ann Arbor in late March or early April we know what we want to discuss.

Questions

- How does Mercedes plan to ensure that only urea is placed in the urea tank?
- What is the durability of the urea dosing valve and associated hardware?
- What is the durability of the entire SCR system - urea tank, dosing valve and lines, SCR catalyst, chimes, bells, lights, etc..?

- How does Mercedes plan to ensure that the 2nd, 3rd, and 4th owners of vehicles will operate vehicles with urea? How will they know how system works, where to get urea, where to put urea, etc..?

Requirements

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Regulatory Issues

- There are two regulatory issues with respect to allowing SCR systems - minimum maintenance intervals and adjustable parameters.
- **Minimum maintenance intervals:** the minimum maintenance interval for diesel LDVs/LDTs is 100,000 miles. Clearly urea would have to be replenished sooner than 100,000 miles, thus we would have to get into a "(b)(7)" process to allow manufacturers to perform maintenance to the catalyst (refill urea) at an interval less than 100,000 miles.

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- **Adjustable parameters:** the use of urea would be considered an adjustable parameter. We have the authority to test a vehicle at the full range of adjustable parameters, meaning we could test the vehicle without urea.

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Please let me know if there are any other questions, concerns, or thoughts.

Linc

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